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April 22, 2015

VIA ECF AND EMAIL

Cameron S. Reuber
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The Honorable Cathy S. Seibel
United States District Judge, S.D.N.Y.
300 Quarropas Street
White Plains, New York 10601
chambersnysdseibel@nysd.uscourts.gov

Re: *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*,
Civil Action No. 13-cv-09239 (CS) (SDNY)

Dear Judge Seibel:

We represent Plaintiff The Wave Studio, LLC in the above-referenced civil action. We write pursuant to Local Civil Rule 1.4 to request entry of an order terminating our firm as counsel of record in this case. Plaintiff consents to this request. *See Dkt.* 103-1, Gerhart Declaration Pursuant to Local Civil Rule 1.4, at ¶ 3. Specifically, Plaintiff will be represented by the following counsel of record from the law firm of Cobalt LLP: Mr. Nate Garhart (*Dkt.* 105), Mr. Vijay Toke (*Dkt.* 110), and Ms. Amanda Conley (*Dkt.* 111).

The reason for our withdrawal is, *inter alia*, Plaintiff's commencement of a separate copyright infringement suit against Mastercard International Inc. ("Mastercard") in California prior to that matter being transferred to New York. That case, Civil Action No. 14-cv-08322-CS, is currently pending before Your Honor with a motion *sub judice* to combine that case with this one (Civil Action No. 13-cv-09239). Plaintiff's counsel of record in the transferred case is Cobalt LLP. Mastercard has advised of a potential conflict of interest regarding our firm's continued representation of Plaintiff in this case and, upon receipt of same, we agreed to withdraw. Notice of our intent to withdraw has been given to GHM (the only other active litigant in this case) as well as counsel of record in the Mastercard case. No objections to our withdrawal have been served or otherwise communicated to us.

Wherefore, based on the foregoing, we respectfully request entry of an order terminating the undersigned as counsel of record in this case. If you have any additional questions regarding this application, please do not hesitate to contact me.

Very truly yours,



Cameron S. Reuber

cc: All Counsel of Record via ECF